

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

BARBARA A DAKIN

Debtor(s).

RESPONSE

**CASE #: 18-35076-cgm
CHAPTER 13**

Wells Fargo Bank, N.A. ("Secured Creditor") by and through its undersigned Counsel, Aleksandra K. Fugate, Esq, files this Reply to the Debtor's Motion to Sell the Property (Docket No. 36) at 25 Winston Ln, Garrison, NY 10524 (the "Subject Property") and respectfully states as follows:

1. On February 8, 2018, Rick Cowle, Esq., attorney for the debtor, filed the Motion to Sell Property under 11 U.S.C. § 363(f) for the Subject Property.
2. The Secured Creditor requests to be paid in full subject to a proper payoff quote.
3. Movant is to request a payoff quote prior to the sale from Secured Creditor.
4. Further, the Secured Creditor requests that any sale short of full payoff be subject to Secured Creditor's final approval.
5. Subsequently, the Secured Creditor requests the closing to happen in a timely fashion from the date of the entered Order and be notified of same.

WHEREAS, the Secured Creditor requests the Order Approving the Sale of the Subject Property include the Secured Creditor to be paid in full subject to a proper payoff quote and any sale short of full payoff be subject to Secured Creditor's final approval and further relief as the Court deems just and proper.

Dated: February 27, 2018
Rochester, New York

/s/ Aleksandra K. Fugate
WOODS OVIATT GILMAN LLP
Aleksandra K. Fugate, Esq.
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SOUTHERN DISTRICT OF NEW YORK**

In Re:

BARBARA A DAKIN

Debtor(s).

AFFIDAVIT OF MAILING

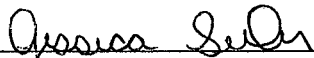
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**STATE OF NEW YORK)
COUNTY OF MONROE) SS:**

I, Jessica V. Suhr, being duly sworn, deposes and says:

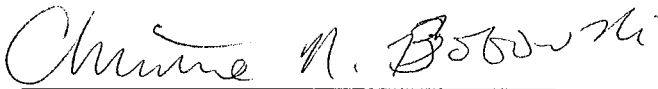
Deponent is not a party to the action, is over 18 years of age and resides in Rochester, New York.

That on February 27, 2018 deponent served the annexed Response on the parties listed in Schedule "A" by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in a post office depository under the exclusive care and custody of the United States Postal Service of the State of New York.



Jessica V. Suhr

Sworn to before me on
February 27, 2018



NOTARY PUBLIC

CHRISTINE N. BOBOWSKI
NOTARY PUBLIC-STATE OF NEW YORK
No. 01806278567
Qualified in Monroe County
My Commission Expires March 25, 20__ 21

SCHEDULE "A"

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Carmel, NY 10512

Barbara A Dakin
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Krista M. Preuss
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United States Trustee
74 Chapel Street
Albany, NY 12207